

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL No. 04-10384-PBS

UNITED STATES

v.

DANIEL KAMEN

DEFENDANT'S SUPPLEMENTAL REQUESTS FOR JURY INSTRUCTIONS

Daniel Kamen, defendant in the above-captioned criminal case, hereby moves this Honorable Court, pursuant to Fed. R. Crim. P. 30, to include the following instructions in its charge to the jury.

LESSER INCLUDED OFFENSE

The law permits the jury to determine whether the government has proven the guilt of Daniel Kamen for any less serious offense which is both supported by the evidence and necessarily included in the crime of receipt of child pornography.

The crime of possession of child pornography is necessarily included within the charge of receipt of child pornography.

Accordingly, there are three possible verdicts you may reach with respect to Daniel Kamen: not guilty; guilty of receipt of child pornography; or guilty of conspiracy of possession of child pornography.

Respectfully submitted,
DANIEL KAMEN
By his attorneys,

/s/ Charles W. Rankin
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 17, 2006.

/s/ Charles W. Rankin
Charles W. Rankin